

ORIGINAL

Scott S. Patrick

D 202.776.2885 E spatrick@dowlohnes.com

October 14, 2009

FILED/ACCEPTED

OCT + 4 2009

Federal Communications Commission Office of the Secretary

VIA COURIER

'Y DowLohnes

Ms. Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, S.W. Washington, DC 20554

Attention:

Video Division

Media Bureau

Re:

WGHP-DT, High Point, North Carolina

Facility I.D. No. 72106

Petition to Amend the DTV Table of Allotments

Dear Ms. Dortch:

On behalf of Community Television of North Carolina, LLC, licensee of commercial television station WGHP-DT, High Point, North Carolina, we hereby transmit an original and four copies of a *Petition for Rule Making* requesting the substitution of Channel 35 for Channel 8 at High Point, North Carolina in the DTV Table of Allotments.

If any additional information is needed in connection with this matter, please contact me.

Respectfully submitted,

Scott S. Patrick

Enclosure

cc:

Ms. Joyce Bernstein (via e-mail)

Mr. Ron Graser (via e-mail)

No. of Copies rec'd 0 + 4
List ABCDE
09-79

OCT 14 2009

Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

Federal Communications Commission Office of the Secretary

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To: Office of the Secretary

Attn: Chief, Video Division Media Bureau

PETITION FOR RULE MAKING TO AMEND THE DTV TABLE OF ALLOTMENTS

By its attorneys and pursuant to Sections 1.401, 73.616, and 73.622(a) of the Commission's Rules, ¹ Community Television of North Carolina, LLC ("Licensee"), licensee of WGHP-DT, High Point, North Carolina (the "Station"), hereby respectfully petitions the Commission to institute a rulemaking to amend Section 73.622(i), the Post-Transition DTV Table of Allotments, by substituting Channel 35 as the Station's allotment in lieu of Channel 8.

Specifically, the Post-Transition DTV Table of Allotments would be amended as follows:

	<u>Present</u>	<u>Proposed</u>
High Point, NC	<u>8</u>	<u>35</u>

⁴⁷ C.F.R. §§ 1.401, 73.616, 73.622(a).

Licensee is seeking the channel substitution because the Station experienced significant technical difficulties following the termination of analog service on June 12, 2009, and its associated transition to operations on the Station's traditional VHF Channel 8. As a result of the transition to the VHF channel, a sizable number of the Station's viewers no longer could receive the Station's over-the-air signal. To accommodate Licensee's ability to analyze and resolve the viewer reception difficulties, the Commission very graciously and expeditiously authorized the Station to resume operations on the pre-transition Channel 35. Since this time, Licensee has operated the Station simultaneously on Channels 8 and 35.

After analyzing the situation, reviewing field test results, and monitoring service for the past months, Licensee has concluded that viewers best would be served by the Station operating on the UHF channel rather than the VHF channel and accordingly is hereby proposing amendment of the Table. As the attached Technical Exhibit demonstrates,³ the proposed operation is not predicted to cause impermissible interference to any station other than WSOC-TV, Charlotte, North Carolina, whose licensee has consented.⁴

The Station's proposed service area encompasses its community of license, would serve all of the Station's associated analog and digital service populations, and would reach over 100% of the Station's currently allotted post-transition DTV service area population.⁵ The antenna is non-directional.

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² See FCC File No. BDSTA-20090617ADU.

See Attachment A, Technical Exhibit at 2; 47 C.F.R. §§ 73.616(b),(e).

See Attachment B, Interference Consent Agreement.

⁵ See Attachment A, Technical Exhibit at 2; 47 C.F.R. §§ 73.623(d), 73.625(a).

For the convenience of the Commission, we hereby provide the present and proposed "Appendix B" parameters:

Present:

Facility	State	and City	NTSC	DTV					
ID			Ch					Longitude (DDDMMSS)	
72106	NC	HIGH POINT	8	8	15	398		354846	795029

Proposed:

72106 NC	HIGH POINT	8	<u>35</u>	<u>1000</u>	365	<u> </u>	354846_	795029

For the foregoing reasons, Licensee respectfully requests that the Commission amend the Post-Transition DTV Table of Allotments as proposed. Adoption would serve the public interest by permitting the Station to continue service to viewers who traditionally have relied upon it.

Respectfully submitted,

COMMUNITY TELEVISION OF NORTH

CAROLINA LICENSE, LLC

By:

Scott S. Patrick Mario J. Weber

Its Attorneys

Dow Lohnes PLLC 1200 New Hampshire Avenue, N.W. Suite 800 Washington, D.C. 20036-6802 (202) 776-2000

Dated: October 14, 2009

ATTACHMENT A

Technical Exhibit

TECHNICAL EXHIBIT PETITION FOR RULE MAKING TO MODIFY THE DTV TABLE OF ALLOTMENTS STATION WGHP-DT HIGH POINT, NORTH CAROLINA

This Technical Exhibit was prepared on behalf of television stations WGHP-DT assigned to High Point, North Carolina in support of a *Petition for Rule Making* to modify its DTV allotment.

The Commission adopted channel 8 for WGHP's post-transition digital operation with a directional antenna maximum effective radiated power (ERP) of 11.5 kilowatts (kW) and an antenna height above average terrain (HAAT) of 398 meters. Due to reception problems on its VHF channel, WGHP-DT desires to propose operation on its former pre-transition DTV UHF Channel 35 for its final post-transition operation.

The following details the proposed modification of its Appendix B facilities.

				DTV							
Facility ID	State & City		Chan	Chan	ERP (kW)	TAAH (m)	Latitude (DDMMSS)	Longitude (DDDMMSS)	Area (sq km)	Population (thousand)	Percent IX Received
72106	6 NC High Point		8	35	1000	365	354846	0795029	30,965	2,789,750	11.4
	Facility Proposes Non-Directional Transmitting Antenna										

The proposed WGHP-DT effective radiated power and antenna height above average terrain complies with Section 73.622(f)(7) of the Commission Rules.

Consulting Engineers

High Point, North Carolina Page 2

Population Served

The herein proposed WGHP-DT Channel 35 facility is predicted to serve 2,789,750 persons, post-transition, based upon the 2000 Census. WGHP-DT's former analog facility was predicted to serve 2,199,590 persons. WGHP-DT's post-transition Channel 8 facility it was operating [FCC File Number BPCDT-20080311ACD] was predicted to serve 2,649,595 persons. Therefore, the herein proposed WGHP-DT facility would serve more than 100% of its associated analog and digital populations.

The proposed WGHP-DT Appendix B facilities complies with the 0.5 percent interference standard adopted by the FCC for post-transition DTV operations as shown in Figure 1 to all stations with the exception toward WSOC-DT on Channel 34 assigned to Charlotte, North Carolina. An interference agreement between WSOC and WGHP has been obtained and is provided within the herein application.

Charles A. Cooper du Treil, Lundin & Rackley, Inc. 201 Fletcher Avenue Sarasota, Florida 34237 (941) 329-6000

September 10, 2009

TECHNICAL EXHIBIT PETITION FOR RULE MAKING TO MODIFY THE DTV TABLE OF ALLOTMENTS STATION WGHP-DT HIGH POINT, NORTH CAROLINA

OET-69 Allocation Analysis

TW Census data selected 2000 Post Transition Data Base Selected /export/home/cdbs/pt tvdb.sff

TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 09-04-2009 Time: 15:48:18

Record Selected for Analysis

WGHP USERRECORD-01 HIGH POINT Channel 35 ERP 1000. kW HAAT 365. m RCAMSL 00577 m Latitude 035-48-46 Longitude 0079-50-29 NC US

Zone 2 Border Status APP

Last update Cutoff date

Docket

Comments Applicant

Cell Size for Service Analysis 1.0 km/side

Distance Increments for Longley-Rice Analysis 0.50 km

Facility meets maximum height/power limits

Azimuth	ERP	HAAT	41.0 dBu F(50,90)
(Deg)	(kW)	(m)	(km)
0.0	1000.000	349.9	101.7
45.0	1000.000	351.6	101.9
90.0	1000.000	374.8	103.9
135.0	1000.000	373.4	103.8
180.0	1000.000	357.9	102.4
225.0	1000.000	382.7	104.6
270.0	1000.000	386.0	104.9
315.0	1000.000	344.6	101.3

Evaluation toward Class A Stations

No Spacing violations or contour overlap to Class A stations

Class A Evaluation Complete

SPACING VIOLATION FOUND BETWEEN STATION

WGHP 35 HIGH POINT

NC USERRECORD01

and station

SHORT TO: WSOC-TV 34 CHARLOTTE NC BLCDT 20040526ANW

035-15-41 0080-43-38

Req. separation => 24.0 <= 110.0 Actual separation 101.0 Short 9.0 (77.0) km

SHORT TO: WSOC-TV 34 CHARLOTTE NC DTVPLN DTVP1260

35 -15-41 80 -43-38

Req. separation => 24.0 <= 110.0 Actual separation 101.0 Short 9.0(77.0) km

LANDMOBILE SPACING VIOLATIONS FOUND

NONE

Proposed facility OK to FCC Monitoring Stations

Proposed facility OK toward West Virginia quiet zone

Proposed facility OK toward Table Mountain

Proposed facility is beyond the Canadian coordination distance

Proposed facility is beyond the Mexican coordination distance

Proposed station is OK toward AM broadcast stations

Start of Interference Analysis

Proposed Station

Channel Call City/State 35 WGHP HIGH POINT NC USERRECORD01

Stations Potentially Affected by Proposed Station

Chan Call City/State Dist(km) Status Application Ref. No. 98.6 LIC 100.9 LIC WGTB - LP CHARLOTTE NC -20000615AGB BLTTL 28 WSOC-TV CHARLOTTE NC BLCDT -20040526ANW 34 WSOC-TV 34 CHARLOTTE NC 100.9 PLN DTVPLN -DTVP1260 SMITHFIELD-SELMA NC 142.5 CP 34 WAR2-LP BDFCDTA -20080320ABZ 35 WDCA WASHINGTON DC 425.9 PLN DTVPLN -DTVP1283 35 WDCA WASHINGTON DC 425.9 CP MOD BMPCDT -20060519ACK 35 WDCA WASHINGTON DC 425.9 APP BPCDT -20080620ANP 352.5 CP 352.5 LIC 35 WCTX-CA VIRGINIA BEACH VA BDFCDTA -20060330AFE 35 WCTX-CA VIRGINIA BEACH VA -19970415IB BLTTL36 WFPX-TV FAYETTEVILLE NC 124.4 LIC BLCDT -20021025AAD 124.4 PLN 36 WFPX FAYETTEVILLE NC DTVPLN -DTVP1336 36 WIINP-TV ROANOKE RAPIDS NO 187.8 CP MOD BMPEDT 187.9 PLN DTVPLN -20080617AAN WUNP-TV ROANOKE RAPIDS NO 36 -DTVP1337 WPXR-TV ROANOKE VA -20020510AAB 36 156.0 LIC BLCDT 36 WPXR ROANOKE VA 156.0 PLN DTVPLN -DTVP1352

Analysis of Interference to Affected Station 1

Analysis of current record City/State Application Ref. No. 28 WOTE-LP CHARLOTTE NC -20000615AGB BLTTL

Stations Potentially Affecting This Station

Chan Call City/State Dist(km) Status Application Ref. No. 27 WCCB CHARLOTTE NC 4.7 LIC BLCDT -20020227AAZ

27	WCCB	CHARLOTTE NC	4.7	PLN	DTVPLN	-DTVP0998			
28	WRDC!	DURHAM NC	200.3	CP MOD	BMPCDT	-20080620AJU			
28	WRDC:	DURHAM NC	201.0	PLN	DTVPLN	-DTVP1041			
28	WTGS:	HARDEEVILLE SC	361.5	CP	BPCDT	-20080718AAH			
28	WTGS	HARDEEVILLE SC	361.5	PLN	DIABIN	-DTVP1049			
28	wrja-tv	SUMTER SC	157.1	LIC	BLEDT	-20040805ABA			
28	WRJATV	SUMTER SC	157.1	PLN	DTVPLN	-DTVP1050			
29	WXLV-TV	WINSTON-SALEM NC	103.7	CP	BPCDT	-19991101ACF			
29	WXLV-TV	WINSTON-SALEM NC	103.7	PLN	DTVPLN	-DTVP1074			
31	WXII-TV	WINSTON-SALEM NC	128.0	LIC	BLCDT	-20050627AAU			
31	WXII-TV	WINSTON-SALEM NC	128.0	PLN	DTVPI_N	-DTVP1149			
32	WUNITV	WINSTON-SALEM NC	128.1	LIC	BLEDT	-20020717AAH			
32	WUNL - TV	WINSTON-SALEM NC	128,2	PLN	DTVPLN	-DTVP1186			
32	WUNL - TV	WINSTON-SALEM NC	128.0	CP	BPEDT	-20080617AAL			
32	WRLK-TV	COLUMBIA SC	128.1	CP	BPEDT	-20080620ACO			
32	WRLK-TV	COLUMBIA SC	128.1	PLN	DIALT	-DTVP1194			
32	WRLK-TV	COLUMBIA SC	128.1	LIC	BMLEDT	-20040826AAL			
43	WLXI	GREENSBORO NC	103.7	CP	BPCDT	-20080619AII			
43	WLXI-TV	GREENSBORO NC	103.7	PLN	DTVPLN	~DTVP1545			
43	WLXI	GREENSBORO NC	103.7	LIC	BLCDT	-20060630ADU			
43	WRET-TV	SPARTANBURG SC	110.9	LIC	BLEDT	-20050324ACD			
43	WRET-TV	SPARTANBURG SC	110.9	PLN	DTVPLN	-DTVP1554			
43	WRET-TV	SPARTANBURG SC	110.9	CP	BPEDT	-20080620ACI			
35	WGHP	HIGH POINT NC	98.6	APP	USERRECORL	0-01			
Prop	osed stat	ion is beyond the site to							
near	est cell	evaluation distance							
####	########	#############	######	#######	:#########	######			
	Analvoic	of Interference to Affecte	d Stati	on 2					
		or interior to writette	G Dearl	JII 2					
n mals	Parluado - 6 a								
-	Analysis of Current record Channel Call City/State Application Ref No.								

```
City/State
CHARLOTTE NC
                                              Application Ref. No.
Channel
            Call
  34
           WSOC-TV
                                                 BLCDT
                                                         -20040526ANW
```

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	on Ref. No.
33	WMYV	GREENSBORO NC	105.9	LIC	BLCDT	-20020430ABD
33	WMYV	GREENSBORO NC	105.9	PLN	DTVPLN	-DTVP1220
34	WPXU-TV	JACKSONVILLE NC	310.1	CP	BPCDT	-20080620AGG
34	WPXU-TV	JACKSONVILLE NC	310.1	PLN	DTVPLN	-DTVP1261
34	WPXU-TV	JACKSONVILLE NC	310.1	LIC	BLCDT	-20021029AAD
34	WCIV	CHARLESTON SC	276.4	LIC	BLCDT	-20060630ADJ
34	WCIV	CHARLESTON SC	276.4	PLN	DIVPLN	-DTVP1270
34	WINZ	KNOXVILLE TN	302.0	LIC	BMLCDT	-20040706ABG
34	WTNZ	KNOXVILLE TN	302.0	PLN	DTVPLN	-DTVP1272
34	WINZ	KNOXVILLE TN	302.0	Cb	BPCDT	-20080619ABZ
34	WPBY-TV	HUNTINGTON WV	382.5	PLN	DTVPLN	-DTVP1278
34	WPBY-TV	HUNTINGTON WV	382.5	LIC	BLEDT	-20040211AAL
34	WPBY-TV	HUNTINGTON WV	382.5	CP	BPEDT	-20080619ACN
35	WGHP	HIGH POINT NC	100.9	APP	USERRECORE	0-01

Total scenarios = 72

Result key:

Scenario 1 Affected station

Before Analysis

Results for: 34A NC CHARLOTTE HAAT 348.0 m, ATV ERP 1000.0 kW BLCDT 20040526ANW LIC POPULATION AREA (sq km) within Noise Limited Contour 2945535 33584.9 not affected by terrain losses lost to NTSC IX 2903174 32884.5 0.0 lost to additional IX by ATV 165789 1497.4

```
lost to ATV IX only
                                    165789
                                                 1497.4
   lost to all IX
                                    165789
                                                 1497.4
 Potential Interfering Stations Included in above Scenario
33A NC GREENSBORO
                           BLCDT
                                     20020430ABD LIC
34A NC JACKSONVILLE
34A SC CHARLESTON
                           BPCDT
                                     20080620AGG
                                                  CP
                                                 LIC
                                     20060630ADJ
                           BLCDT
                                     20040706ABG LIC
34A TN KNCXVILLE
                           BMLCDT
After Analysis
                                        BLCDT
Results for: 34A NC CHARLOTTE
                                                  20040526ANW LIC
  HAAT 348.0 m, ATV ERP 1000.0 kW
                                 POPULATION
                                              AREA (sq km)
   within Noise Limited Contour
                                   2945535
                                                33584.9
   not affected by terrain losses
                                   2903174
                                                32884.5
   lost to NTSC IX
                                                   0.0
                                         Ó
                                    227274
   lost to additional IX by ATV
                                                 2162.9
   lost to ATV IX only
                                    227274
                                                 2162.9
   lost to all IX
                                    227274
                                                 2162.9
 Potential Interfering Stations Included in above Scenario
33A NC GREENSBORO
                           BLCDT
                                     20020430ABD LIC
34A NC JACKSONVILLE
                           BPCDT
                                     20080620AGG
                                                 CP
34A SC CHARLESTON
                           BLCDT
                                     20060630ADJ
                                                 LIC
34A TN KNOXVILLE
                           BMLCDT
                                     20040706ABG
                                                  LIC
                           USERRECORD01
35A NC HIGH POINT
                                                  APP
 The following station failed the de minimis interference criteria.
 35D NC HIGH POINT
                            USERRECORD01
 ERP 1000.00 kW HAAT 365.0 m RCAMSL 577.0 m
            none
 Antenna
 Due to interference to the following station and scenario:
 34D NC CHARLOTTE
                           BLCDT
                                     20040526ANW
ERP 1000.00 kW HAAT 348.0 m RCAMSL 565.0 m
Antenna CDB 99999999999999
 Percent new interference from proposal:
                                              2,2461 to BLCDT
                                                                 20040526ANW
Worst case new IX
                    2.2505% Scenario
Analysis of Interference to Affected Station 3
Analysis of current record
                          City/State
Channel
           Call
                                            Application Ref. No.
                     CHARLOTTE NC
          WSOC-TV
                                               DTVPLN -DTVP1260
    Stations Potentially Affecting This Station
Chan
      Call
                City/State
                                     Dist(km) Status Application Ref. No.
33
      WMYV
              GREENSBORO NC
                                        105.9 LIC
                                                     BLCDT
                                                                -20020430ABD
 33
      WMYV
              GREENSBORO NC
                                        105.9 PLN
                                                      DTVPLN
                                                                -DTVP1220
 34
      WPXU-TV
              JACKSONVILLE NC
                                        310.1
                                               CP
                                                      BPCDT
                                                                -20080620AGG
 34
      WPXU-TV
              JACKSONVILLE NC
                                        310.1 PLN
                                                      DTVPLN
                                                                -DTVP1261
 34
      WPXU-TV
              JACKSONVILLE NO
                                                                -20021029AAD
                                        310.1
                                               LIC
                                                      BLCDT
 34
      WCIV
              CHARLESTON SC
                                        276.4 LIC
                                                      BLCDT
                                                                -20060630ADJ
 34
      WCIV
              CHARLESTON SC
                                        276.4 PLN
                                                      DTVPLN
                                                                -DTVP1270
 34
     WINZ
              KNOXVILLE IN
                                        302.0 LIC
                                                      BMLCDT
                                                                -20040706ABG
 34
      WINZ
              KNOXVILLE TN
                                        302.0 PLN
302.0 CP
                                                      DTVPLN
                                                                -DTVP1272
              KNOXVILLE TN
 34
      WTNZ
                                                      BPCDT
                                                                -20080619ABZ
      WPBY-TV HUNTINGTON WV
                                        382.5 PLN
382.5 LIC
 34
                                                     DTVPLN
                                                                -DTVP1278
      WPBY-TV
              HUNTINGTON WV
 34
                                                      BLEDT
                                                                -20040211AAL
                                        382.5 CP
     WPBY-TV
              HUNTINGTON WV
                                                      BPEDT
                                                                -20080619ACN
```

```
35 WGHP
           HIGH POINT NC
                                      100.9 APP
                                                   USERRECORD-01
Total scenarios = 72
Result key: 73
Scenario 1 Affected station 3
Before Analysis
Results for: 34A NC CHARLOTTE
                                      DTVPLN DTVP1260
                                                              PLN
   HAAT 348.0 m, ATV ERP 1000.0 kW
                                POPULATION AREA (sq km)
   within Noise Limited Contour
                                   2945535
                                               33584.9
   not affected by terrain losses
                                   2903174
                                               32884.5
                                        n
                                                  0.0
   lost to NTSC IX
                                    165789
   lost to additional IX by ATV
                                                1497.4
   lost to ATV IX only
                                    165789
                                                1497.4
   lost to all IX
                                    165789
                                                1497.4
 Potential Interfering Stations Included in above Scenario
33A NC GREENSBORO
                           BLCDT
                                     20020430ABD LIC
34A NC JACKSONVILLE
                                     20080620AGG CP
                           BPCDT
34A SC CHARLESTON
                           BLCDT
                                     20060630ADJ LIC
                           BMLCDT 20040706ABG LIC
34A TN KNOXVILLE
After Analysis
                                      DTVPLN DTVP1260
Results for: 34A NC CHARLOTTE
                                                              PLN
  HAAT 348.0 m, ATV ERP 1000.0 kW
   POPULATION AREA (sq km) within Noise Limited Contour 2945535 33584.9
                                             33584.9
   not affected by terrain losses
                                                32884.5
                                   2903174
   lost to NTSC IX
                                    0
                                                  0.0
                                    227274
                                                2162.9
   lost to additional IX by ATV
   lost to ATV IX only
                                    227274
                                                2162 9
   lost to all IX
                                    227274
                                                2162.9
 Potential Interfering Stations Included in above Scenario
33A NC GREENSBORO
                           BLCDT
                                     20020430ABD LIC
34A NC JACKSONVILLE
                           BPCDT
                                     20080620AGG CP
34A SC CHARLESTON
                           BLCDT
                                     20060630ADJ LIC
34A TN KNOXVILLE
                           BMLCDT
                                     20040706ABG LIC
35A NC HIGH POINT
                           USERRECORD01
                                                  APP
 The following station failed the de minimis interference criteria.
 35D NC HIGH POINT
ERP 1000.00 kW HAAT
                          USERRECORD01
                       365.0 m RCAMSL 577.0 m
 Antenna
            none
 Due to interference to the following station and scenario:
 34D NC CHARLOTTE DTVPLN DTVP1260
ERP 1000.00 kW HAAT 348.0 m RCAMSL 565.0 m
 Antenna CDB 99999999999999
 Percent new interference from proposal:
                                             2.2461 to DTVPLN
                                                               DTVP1260
                    2.2505% Scenario
Worst case new IX
Analysis of Interference to Affected Station 4
Analysis of current record
Analysis of Call City/State
Channel Call City/State
WARZ-LP SMITHFIELD-SELMA NC
                                           Application Ref. No.
                                              BDFCDTA -20080320ABZ
```

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	on Ref. No.
33	WMYV	GREENSBORO NC	142.4	LIC	BLCDT	-20020430ABD
33	WMYV	GREENSBORO NC	142.4	PLN	DTVPLN	-DTVP1220
33	WTVZ-TV	NORFOLK VA	215.1	CP MOD	BMPCDT	-20080620AJZ
33	WTVZ-TV	NORFOLK VA	215.1	PLN	DTVPLN	-DTVP1234
34	WSOC-TV	CHARLOTTE NC	221.8	LIC	BLCDT	-20040526ANW
34	WSOC-TV	CHARLOTTE NC	221.9	PLN	DTVPLN	-DTVP1260
34	WPXU-TV	JACKSONVILLE NC	136.6	CP	BPCDT	-20080620AGG
34	WPXU-TV	JACKSONVILLE NC	136.6	PLN	DTVPLN	-DTVP1261
34	WPXU-TV	JACKSONVILLE NC	136.6	LIC	BLCDT	-20021029AAD
34	WCIV	CHARLESTON SC	316.7	LIC	BLCDT	-20060630ADJ
34	WCIV	CHARLESTON SC	316.7	PLN	DTVPLN	-DTVP1270
34	WPXW-TV	MANASSAS VA	395.3	CP MOD	BMPCDT	-20080620AML
34	WPXW	MANASSAS VA	395.3	PLN	DTVPLN	-DTVP1275
35	WGHP	HIGH POINT NC	142.5	APP	USERRECORI	0-01

Proposed station is beyond the site to nearest cell evaluation distance

Analysis of Interference to Affected Station 5

Analysis of current record City/State Application Ref. No. 35 WDCA WASHINGTON DC DTVPLN -DTVP1283

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	on Ref. No.			
34	WJAC-TV	JOHNSTOWN PA	226.2	CP	BPCDT	-20080619ADU			
34	WJAC-TV	JOHNSTOWN PA	226.2	PLN	DTVPLN	-DTVP1267			
34	WJAC-TV	JOHNSTOWN PA	226.2	LIC	BLCDT	~20051123AKN			
34	WCAU	PHILADELPHIA PA	199.1	CP	BPCDT	-20080620AKG			
34	WCAU	PHILADELPHIA PA	199.1	PLN	DTVPLN	-DTVP1268			
34	WPXW-TV	MANASSAS VA	0.7	CP MOD	BMPCDT	-20080620AML			
34	WPXW	MANASSAS VA	0.7	PLN	DTVPLN	-DTVP1275			
35	WOUC-TV	CAMBRIDGE OH	382.0	LIC	BLEDT	-20050427AAB			
35	WOUC-TV	CAMBRIDGE OH	382.0	PLN	DTVPLN	-DTVP1302			
35	WYBE	PHILADELPHIA PA	199.1	CP MOD	BMPEDT	-20080620ANN			
35	WYBE	PHILADELPHIA PA	199.1	PLN	DTVPLN	-DTVP1305			
36	WTTG	WASHINGTON DC	0.0	LIC	BLCDT	-19991013AAB			
36	WTTG	WASHINGTON DC	0.1	PLN	DTVPLN	-DTVP1320			
36	WTTG	WASHINGTON DC	0.0	CP	BPCDT	-20080313ACG			
36	WGPT	OAKLAND MD	196.9	CP MOD	BMPBDT	-20080620 AN K			
36	WGPT	OAKLAND MD	196.9	PLN	DTVPLN	-DTVP1332			
36	WMGM-TV	WILDWOOD NJ	200.9	LIC	BLCDT	-20060626ABE			
36	WMGM-TV	WILDWOOD NJ	200.9	PLN	DTVPLN	-DTVP1339			
36	WITF-TV	HARRISBURG PA	155.5	LIC	BLEDT	-20000922AHE			
36	WITF - TV	HARRISBURG PA	155.5	PLN	DTVPLN	-DTVP1344			
36	WITF-TV	HARRISBURG PA	155.5	APP	BPEDT	-20080620AMA			
35	WGHP	HIGH POINT NC	425.9	APP	USERRECORI	0-01			
Prop	Proposal causes no interference								

Analysis of Interference to Affected Station 6

Analysis of Current record
Channel Call City/State
35 WDCA WASHINGTON DC Application Ref. No. BMPCDT -20060519ACK

Stations Potentially Affecting This Station

Figure 2

Chan	Call	City/State	Dist(km)	Status	Application	on Ref. No.		
34	WJAC-TV	JOHNSTOWN PA	226.2	CP	BPCDT	-20080619ADU		
34	WJAC-TV	JOHNSTOWN PA	226.2	PLN	DTVPLN	-DTVP1267		
34	WJAC-TV	JOHNSTOWN PA	226.2	LIC	BLCDT	-20051123AKN		
34	WCAU	PHILADELPHIA PA	199.1	CP	BPCDT	-20080620AKG		
34	WCAU	PHILADELPHIA PA	199.1	PLN	DTVPLN	-DTVP1268		
34	WPXW-TV	MANASSAS VA	0.7	CP MOD	BMPCDT	-20080620AML		
34	WPXW	MANASSAS VA	0.7	PLN	DTVPLN	-DTVP1275		
35	WOUC-TV	CAMBRIDGE OH	382.0	LIC	BLEDT	-20050427AAB		
35	WOUC-TV	CAMBRIDGE OH	382.0	PLN	DTVPLN	-DTVP1302		
35	WYBE	PHILADELPHIA PA	199.1	CP MOD	BMPEDT	-20080620 ANN		
35	WYBE	PHILADELPHIA PA	199.1	PLN	DTVPLN	-DTVP1305		
36	WTTG	WASHINGTON DC	0.0	LIC	BLCDT	-19991013 AA B		
36	WTTG	WASHINGTON DC	0.1	PLN	DTVPLN	-DTVP1320		
36	WTTG	WASHINGTON DC	0.0	CP	BPCDT	-20080313ACG		
36	WGPT	OAKLAND MD	196.9	CP MOD	BMPEDT	-20080620 AN K		
36	WGPT	OAKLAND MD	196.9	PLN	DTVPLN	-DTVP1332		
36	WMGM-TV	WILDWOOD NJ	200.9	LIC	BLCDT	-20060626ABE		
36	WMGM-TV	WILDWOOD NJ	200.9	PLN	DTVPLN	-DTVP1339		
36	WITF-TV	HARRISBURG PA	155.5	LIC	BLEDT	-20000922AHE		
36	WITF-TV	HARRISBURG PA	155.5	PLN	DTVPLN	-DTVP1344		
36	WITF-TV	HARRISBURG PA	155.5	APP	BPEDT	-20080620AMA		
35	WGHP	HIGH POINT NC	425.9	APP	USERRECORI	0-01		
Prop	Proposal sauses no interference							

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Analysis of Interference to Affected Station 7

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Analysis of current record

Channel Call City/State Application Ref. No.

35 WDCA WASHINGTON DC BPCDT -20080620ANP
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Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	on Ref. No.			
34	WJAC-TV	JOHNSTOWN PA	226.2	CP	BPCDT	-20080619ADU			
34	WJAC~TV	JOHNSTOWN PA	226.2	PLN	DTVPLN	-DTVP1267			
34	WJAC-TV	JOHNSTOWN PA	226.2	LIC	BLCDT	-20051123AKN			
34	WCAU	PHILADELPHIA PA	199.1	CP	BPCDT	-20080620AKG			
34	WCAU	PHILADELPHIA PA	199.1	PLN	DTVPLN	-DTVP1268			
34	WPXW-TV	MANASSAS VA	0.7	CP MOD	BMPCDT	-20080620AML			
34	WPXW	MANASSAS VA	0.7	PLN	DTVPLN	-DTVP1275			
35	WOUC - TV	CAMBRIDGE OH	382.0	LIC	BLEDT	-20050427AAB			
35	WOUC-TV	CAMBRIDGE OH	382.0	PLN	DTVPLN	-DTVP1302			
35	WYBE	PHILADELPHIA PA	199.1	CP MOD	BMPEDT	-20080620ANN			
35	WYBE	PHILADELPHIA PA	199.1	PLN	DTVPLN	-DTVP1305			
36	WTTG	WASHINGTON DC	0.0	LIC	BLCDT	-19991013AAB			
36	WTTG	WASHINGTON DC	0.1	PLN	DTVPLN	-DTVP1320			
36	WTTG	WASHINGTON DC	0.0	CP	BPCDT	-20080313ACG			
36	WGPT	OAKLAND MD	196.9	CP MOD	EMPEDT	-20080620ANK			
36	WGPT	OAKLAND MD	196.9	PLN	DTVPLN	-DTVP1332			
36	WMGM-TV	WILDWOOD NJ	200.9	LIC	BLCDT	-20060626ABE			
36	WMGM~TV	WILDWOOD NJ	200.9	PLN	DTVPLN	-DTVP1339			
36	WITF-TV	HARRISBURG PA	155.5	LIC	BLEDT	-20000922AHE			
36	WITF-TV	HARRISBURG PA	155.5	PLN	DTVPLN	-DTVP1344			
36	WITF-TV	HARRISBURG PA	155.5	APP	BPEDT	-20080620AMA			
35	WGHP	HIGH POINT NC	425.9	APP	USERRECORI)-01			
Prop	Proposal causes no interference								

Analysis of Interference to Affected Station 8

Analysis of current record Channel Call City/State Application Ref. No.

```
VIRGINIA BEACH VA
                                             BDFCDTA
   35
          WCTX-CA
                                                      -20060330AFE
    Stations Potentially Affecting This Station
                                    Dist(km) Status Application Ref. No.
Chan
      Call
                City/State
     WDCA
              WASHINGTON DC
                                       249.7 PLN
                                                    DTVPLN
                                                              -DTVP1283
35
     WDCA
              WASHINGTON DC
                                       249.7 CP MOD BMPCDT
                                                              -20060519ACK
 35
 35
     WDCA
              WASHINGTON DC
                                       249.7 APP
                                                    BPCDT
                                                              -20080620ANP
 35
     WYBE
              PHILADELPHIA PA
                                       363.8 CP MOD BMPEDT
                                                              ~20080620ANN
 35
     WYBE
              PHILADELPHIA PA
                                       363.8 PLN
                                                    DTVPLN
                                                              -DTVP1305
 36
     WUNP-TV
              ROANOKE RAPIDS NC
                                       165.2 CP MOD BMPEDT
                                                              -20080617AAN
              ROANOKE RAPIDS NC
 36
     WUNP-TV
                                       165.1 PLN
                                                    DTVPLN
                                                              -DTVP1337
              HIGH POINT NC
                                       352.5 APP
                                                    USERRECORD-01
 35
     WCHP
 Proposed station is beyond the site to
 nearest cell evaluation distance
Analysis of Interference to Affected Station
Analysis of current record
Channel
           Call
                         City/State
                                           Application Ref. No.
                                             BLTTL
                                                      -19970415IB
          WCTX-CA
                     VIRGINIA BEACH VA
  35
    Stations Potentially Affecting This Station
Chan
      Call
                City/State
                                    Dist(km) Status Application Ref. No.
 31
     WAVY-TV
              PORTSMOUTH VA
                                        35.1 LIC
                                                    BLCDT
                                                              -20010409ABP
 31
     WAVY-TV
              PORTSMOUTH VA
                                        35.1 PLN
                                                    DTVPLN
                                                              -DTVP1160
                                        34.5 CP MOD BMPCDT
 33
     WTVZ-TV
              NORFOLK VA
                                                              -20080620AJZ
 33
     WTVZ-TV
              NORFOLK VA
                                        34.5 PLN
                                                    DTVPLN
                                                              -DTVP1234
              WASHINGTON DC
 35
     WDCA
                                       249.7 PLN
                                                    DTVPLN
                                                              -DTVP1283
 35
     WDCA
              WASHINGTON DC
                                       249.7 CP MOD BMPCDT
                                                              -20060519ACK
 35
     WDCA
              WASHINGTON DC
                                       249.7 APP
                                                    BPCDT
                                                              -20080620ANP
                                       363.8 CP MOD BMPEDT
     WYBE
              PHILADELPHIA PA
                                                              -20080620ANN
 35
              PHILADELPHIA PA
 35
     WYBE
                                       363.8 PLN
                                                    DTVPLN
                                                              -DTVP1305
              PORTSMOUTH VA
 50
     WCNT
                                                              -20080616ABC
                                        30.8 CP
                                                    B PCDT
              PORTSMOUTH VA
                                                    DTVPLN
 50
     WCNT
                                        30.8 PLN
                                                              -DTVF1784
 50
     WCNT
              PORTSMOUTH VA
                                        30.8 LIC
                                                    BLCDT
                                                              -20020718AAK
 35
     WGHP
              HIGH POINT NC
                                       352.5 APP
                                                    USERRECORD-01
 Proposed station is beyond the site to
nearest cell evaluation distance
Analysis of Interference to Affected Station 10
Analysis of current record
Channel
                         City/State
                                           Application Ref. No.
           Call
  36
          WFPX-TV
                     FAYETTEVILLE NC
                                              BLCDT
                                                       -20021025AAD
    Stations Potentially Affecting This Station
Chan
                City/State
                                    Dist(km) Status Application Ref. No.
      Call.
     WUNP-TV
              ROANOKE RAPIDS NO
                                       192.2 CP MOD BMPEDT
                                                             -20080617AAN
36
     WUNP - TV
              ROANOKE RAPIDS NC
                                                    DTVPLN
 36
                                       192.3 PLN
                                                              -DTVP1337
 36
     WMMP
              CHARLESTON SC
                                             CP MOD BMPCDT
                                       223.6
                                                              -20080620AJI
              CHARLESTON SC
 36
     WMMP
                                                    DTVPLN
                                       223.6 PLN
                                                              -DTVP1345
 36
     WYFF
              GREENVILLE SC
                                       322.4 PLN
                                                    DTVPLN
                                                              -DTVP1346
 36
     WYFF
              GREENVILLE SC
                                       322.6 CP
                                                    BPCDT
                                                              -20080317ABT
 36
     WPXR - TV
              ROANOKE VA
                                       274.4 LIC
                                                    BLCDT
                                                              -20020510AAB
```

274.4 PLN

124.4 APP

DTVPLN

USERRECORD-01

-DTVP1352

36

35

WPXR

WGHP

ROANOKE VA

HIGH POINT NO

Total scenarios = 32 Result key: 145 Scenario 1 Affected station 10 Before Analysis Results for: 36A NC FAYETTEVILLE BLCDT 20021025AAD LIC HAAT 242.0 m, ATV ERP 1000.0 kW POPULATION AREA (sq km) within Noise Limited Contour 986611 20577.4 not affected by terrain losses 986359 20485.6 lost to NTSC IX 0.0 0 lost to additional IX by ATV 5955 292.8 lost to ATV IX only 5955 292.8 lost to all IX 5955 292 B Potential Interfering Stations Included in above Scenario 36A NC ROANOKE RAPIDS BMPEDT 20080617AAN CP 36A SC CHARLESTON BMPCDT 20080620AJI CP 36A SC GREENVILLE DTVPLN DTVP1346 PLN 36A VA ROANOKE BLCDT 20020510AAB LIC After Analysis Results for: 36A NC FAYETTEVILLE BLCDT 20021025AAD LIC HAAT 242.0 m, ATV ERP 1000.0 kW POPULATION AREA (sq km) 20577.4 986611 within Noise Limited Contour not affected by terrain losses 986359 20485.6 lost to NTSC IX 0 0.0 lost to additional IX by ATV 9872 425.5 lost to ATV IX only lost to all IX 9872 425.5 9872 425.5 Potential Interfering Stations Included in above Scenario 36A NC ROANOKE RAPIDS BMPEDT 20080617AAN CP 36A SC CHARLESTON BMPCDT 20080620AJI CP 36A SC GREENVILLE DIVPLN DTVP1346 PLN 36A VA ROANOKE BLCDT 20020510AAB LIC 35A NC HIGH POINT USERRECORD01 APP Percent new IX = 0.3995% Worst case new IX 0.4445% Scenario 15 ************************* Analysis of Interference to Affected Station 11 Analysis of current record City/State Channel Call Application Ref. No. FAYETTEVILLE NC DTVPLN -DTVP1336 36 Stations Potentially Affecting This Station City/State Chan Call Dist(km) Status Application Ref. No.

WUNP-TV ROANOKE RAPIDS NC

ROANOKE RAPIDS NO

CHARLESTON SC

CHARLESTON SC

GREENVILLE SC

GREENVILLE SC

HIGH POINT NC

ROANOKE VA

ROANOKE VA

36

36

36

36

36

36

36

36

WUNP-TV

WPXR-TV

WMMP

WMMP

WYFF

WYFF

WPXR

WGHP

192.2 CP MOD BMPEDT

223.6 CP MOD BMPCDT

DTVPLN

DTVPLN

DTVPLN

BPCDT

BLCDT

DTVPLN

USERRECORD-01

192.3 PLN

223.6 PLN 322.4 PLN

322.6 CP

274.4 LIC

274.4 PLN 124.4 APP -20080617AAN

-20080620AJI

-20020510AAB

-DTVP1337

-DTVP1345

-DTVP1346 -20080317ABT

-DTVP1352

Total scenarios = 32 Result key: 177 1 Affected station Scenario 11 Before Analysis Results for: 36A NC FAYETTEVILLE DTVPLN DTVP1336 DT.N HAAT 242.0 m, ATV ERP 1000.0 kW POPULATION AREA (sq km) within Noise Limited Contour 986611 20577.4 not affected by terrain losses 986359 20485,6 lost to NTSC IX 0 0.0 lost to additional IX by ATV 5955 292.8 lost to ATV IX only 5955 292.8 lost to all IX 5955 292.8 Potential Interfering Stations Included in above Scenario RMPRDT 36A NC ROANOKE RAPIDS 20080617AAN 36A SC CHARLESTON BMPCDT 20080620AJI CP 36A SC GREENVILLE DTVPLN DTVP1346 PLN 36A VA ROANOKE BLCDT 20020510AAB LIC After Analysis DTVPLN PLN Results for: 36A NC FAYETTEVILLE DTVP1336 HAAT 242.0 m, ATV ERP 1000.0 kW POPULATION AREA (sq km) within Noise Limited Contour 20577.4 986611 20485.6 not affected by terrain losses 986359 lost to NTSC IX ٥ 0.0 lost to additional IX by ATV 9872 425.5 lost to ATV IX only 9872 425.5 lost to all IX Potential Interfering Stations Included in above Scenario 36A NC ROANOKE RAPIDS BMPEDT 20080617AAN 36A SC CHARLESTON SMPCDT 20080620AJI CP 36A SC GREENVILLE DTVPI.N DTVP1 346 PIN 36A VA ROANOKE BLCDT 20020510AAB LIC 35A NC HIGH POINT USERRECORD01 APP Percent new IX = 0.3995% 0.4445% Scenario Worst case new IX ************************* Analysis of Interference to Affected Station 12 Analysis of current record Channel Call City/State Application Ref. No. 36 WUNP-TV ROANOKE RAPIDS NO BMPEDT -20080617AAN Stations Potentially Affecting This Station

Dist(km) Status Application Ref. No.

BLCDT

BPCDT

DTVPLN

BLCDT

BLCDT

DTVPLN

DTVPLN

-19991013AAB

-20080313ACG

-20080620ANK

-20021025AAD

-20060626ABE

-DTVP1320

-DTVP1332

-DTVP1336

303.6 LIC 303.6 PLN

303.6 CP

368.9 PLN 192.2 LIC

192.2 PLN

414.8 LIC

368.9 CP MOD BMPEDT

Chan

36

36

36

36

36

36

36

36

Call

WITG

WITG

WTTG

WGPT

WGPT

WEPX

WFPX-TV

City/State

WASHINGTON DC

WASHINGTON DC

WASHINGTON DC

FAYETTEVILLE NC

FAYETTEVILLE NC

OAKLAND MD

OAKLAND MD

WMGM-TV WILDWOOD NJ

36 36 36 36 36	WMGM-TV WMMP WMMP WPXR-TV WPXR	WILDWOOD NJ CHARLESTON SC CHARLESTON SC ROANOKE VA ROANOKE VA	414.8 409.4 409.4 229.7 229.7	PLN CP MOD PLN LIC PLN	DTVPLN BMPCDT DTVPLN BLCDT DTVPLN	-DTVP1339 -20080620AJI -DTVP1345 -20020510AAB -DTVP1352
35	WGHP	HIGH POINT NC	187.8		USERRECORI	
Proposal causes no interference						

Analysis of Interference to Affected Station 13

Analysis of current record City/State Application Ref. No. WUNP-TV ROANOKE RAPIDS NC DTVPLN -DTVP1337 36

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	on Ref. No.
36	WTTG	WASHINGTON DC	303.5	LIC	BLCDT	-1999I013AAB
36	WTTG	WASHINGTON DC	303.5	PLN	DTVPLN	-DTVP1320
36	WTTG	WASHINGTON DC	303.5	CP	BPCDT	-20080313ACG
36	WGPT	OAKLAND MD	368.9	CP MOD	BMPEDT	-20080620ANK
36	WGPT	OAKLAND MD	368.9	PLN	DIVPLN	-DTVP1332
36	WPPX-TV	FAYETTEVILLE NC	192.3	LIC	BLCDT	-20021025AAD
36	WFPX	FAYETTEVILLE NC	192.3	PLN	DTVPLN	-DTVP1336
36	WMGM - TV	WILDWOOD NJ	414.8	LIC	BLCDT	-20060626ABE
36	WMGM - TV	WILDWOOD NJ	414.8	PLN	DTVPLN	-DTVP1339
36	WMMP	CHARLESTON SC	409.5	CP MOD	BMPCDT	-20080620AJI
36	WMMP	CHARLESTON SC	409.5	PLN	DTVPLN	-DTVP1345
36	WPXR - TV	ROANOKE VA	229.8	LIC	BLCDT	-20020510AAB
36	WPXR	ROANOKE VA	229.8	PLN	DT VPLN	-DTVP1352
35	WGHP	HIGH POINT NC	187.9	APP	USERRECORI	0-01

Proposed station is beyond the site to nearest cell evaluation distance

Analysis of Interference to Affected Station 14

Analysis of current record
Chappel Call City/State Application Ref. No. WPXR-TV ROANOKE VA BLCDT -20020510AAB 36

Stations Potentially Affecting This Station

Chan	Call.	City/State	Dist(km)	Status	Application	on Ref. No.
36	WTTG	WASHINGTON DC	332.7	LIC	BLCDT	-19991013AAB
36	WTTG	WASHINGTON DC	332.7	PLN	DTVPLN	-DTVP1320
36	WTTG	WASHINGTON DC	332.7	CP	BPCDT	-20080313ACG
36	WKYT-DR	LEXINGTON KY	385.4	APP	BPRM	-20090821AEA
36	WGPT	OAKLAND MD	257.0	CP MOD	BMPEDT	-20080620ANK
36	WGPT	OAKLAND MD	257.0	PLN	DTVPLN	-DTVP1332
36	WFPX-TV	FAYETTEVILLE NC	274.4	LIC	BLCDT	-20021025AAD
36	WFPX	FAYETTEVILLE NC	274.4	PLN	DTVPLN	-DTVP1336
36	WUNP-TV	ROANOKE RAPIDS NC	229.7	CP MOD	BMPEDT	-20080617AAN
36	WUNP - TV	ROANOKE RAPIDS NC	229.8	PLN	DTVPLN	-DTVP1337
36	WTTE	COLUMBUS OH	393.6	CP	BPCDT	-19991029AGZ
36	WTTE	COLUMBUS OH	393.6	PLN	DTVPLN	-DTVP1341
36	WYFF	GREENVILLE SC	319.1	PLN	DTVPLN	-DTVP1346
36	WYFF	GREENVILLE SC	319.1	CP	BPCDT	-20080317ABT
35	WGHP	HIGH POINT NC	156.0	APP	USERRECORI	0-01

Total scenarios = 288

-20080313ACG

-20090821AEA

Result key: 209 1 Affected station 209 Scenario Before Analysis BLCDT 20020510AAB LIC Results for: 36A VA ROANOKE HAAT 623.0 m, ATV ERP 700.0 kW POPULATION AREA (sq km) within Noise Limited Contour 1248337 35759 6 not affected by terrain losses 1076681 29691.1 lost to NTSC IX 0 0.0 14889 489.4 lost to additional IX by ATV lost to ATV IX only 14889 489.4 lost to all IX 14889 489.4 Potential Interfering Stations Included in above Scenario 36A DC WASHINGTON BLCDT 19991013AAB LIC 36A MD OAKLAND BMPEDT 20080620ANK CP 36A NC FAYETTEVILLE BLCDT 20021025AAD LIC 36A NC ROANOKE RAPIDS BMPEDT 20080617AAN CP 36A OH COLUMBUS BPCDT 19991029AGZ CP 36A SC GREENVILLE DTVPLN DTVP1346 PLN After Analysis 20020510AAB LIC Results for: 36A VA ROANOKE RICDT HAAT 623.0 m, ATV ERP 700.0 kW POPULATION AREA (sq km) within Noise Limited Contour 1248337 35759.6 not affected by terrain losses 1076681 29691.1 lost to NTSC IX 0 0.0 lost to additional IX by ATV 15080 495.3 lost to ATV IX only 15080 495.3 lost to all IX 15080 495.3 Potential Interfering Stations Included in above Scenario 36A DC WASHINGTON BLCDT 19991013AAB LIC 36A MD OAKLAND BMPEDT 20080620ANK CP 36A NC FAYETTEVILLE BLCDT 20021025AAD LIC 36A NC ROANOKE RAPIDS BMPEDT 20080617AAN CP 36A OH COLUMBUS BPCDT 19991029AGZ CP 36A SC GREENVILLE DTVPLN DTVP1346 PLN 35A NC HIGH POINT USERRECORD01 APP Percent new IX = 0.0180% Percent new IX = 0.0179% Worst case new IX 0.0180% Scenario 98 Analysis of Interference to Affected Station 15 Analysis of current record City/State Application Ref. No. Channel Call 36 WPXR ROANOKE VA DTVPLN -DTVP1352 Stations Potentially Affecting This Station Chan Call City/State Dist(km) Status Application Ref. No. WTTG WASHINGTON DC 36 332.7 LIC BLCDT -19991013**AA**B 36 WTTG WASHINGTON DC 332.7 PLN DTVPLN -DTVP1320

332.7 CP

385.4 APP

BPCDT

RPRM

36

36

WITG

WASHINGTON DC

WKYT-DR LEXINGTON KY

Figure 2

```
WGPT
 36
               OAKLAND MD
                                        257.0 CP MOD BMPEDT
                                                                -20080620ANK
 36
      WGPT
               OAKLAND MD
                                        257.0 PLN
                                                      DTVPLN
                                                                -DTVP1332
      WFPX-TV
              FAYETTEVILLE NC
                                        274.4
                                                      BLCDT
                                                                -20021025AAD
 36
                                               LIC
               FAYETTEVILLE NC
                                        274.4
 36
      WFPX.
                                                      DTVPLN
                                                                -DTVP1336
                                               PLN
 36
              ROANOKE RAPIDS NO
                                               CP MOD BMPEDT
      WINE-TV
                                        229.7
                                                                -20080617AAN
      WINE-TV
 36
               ROANOKE RAPIDS NC
                                        229.8 PLN
                                                      DTVPLN
                                                                -DTVP1337
 36
      WTTE
               COLUMBUS OF
                                        393.6 CP
                                                      BPCDT
                                                                -19991029AGZ
               COLUMBUS OF
 36
      WITE
                                        393.6
                                               PLN
                                                      DTVPLN
                                                                -DTVP1341
 36
      WYFF
               GREENVILLE SC
                                        319.1
                                               PLN
                                                      DTVPLN
                                                                -DTVP1346
 36
      WYFF
               GREENVILLE SC
                                        319.1 CP
                                                      BPCDT
                                                                -20080317ABT
                                        156.0 APP
 35
      WGHF
               HIGH POINT NC
                                                      USERRECORD-01
Total scenarios =
Result key:
                497
Scenario
               1 Affected station
                                         15
Before Analysis
Results for: 36A VA ROANOKE
                                        DTVPLN
                                                  DTVP1352
                                                               PLN
  HAAT 623.0 m, ATV ERP 700.0 kW
                                 POPULATION
                                              AREA (sq km)
                                                35759.6
  within Noise Limited Contour
                                   1248337
  not affected by terrain losses
                                   1076681
                                                29691.1
   lost to NTSC IX
                                                    0.0
                                        0
   lost to additional IX by ATV
                                     14889
                                                  489.4
   lost to ATV IX only
                                     14889
                                                  489.4
   lost to all IX
                                     14889
                                                  489.4
 Potential Interfering Stations Included in above Scenario
                                                              1
36A DC WASHINGTON
                           BLCDT
                                     19991013AAB LIC
36A MD OAKLAND
                           BMPEDT
                                     20080620ANK
                                                  CP
36A NC FAYETTEVILLE
                           BLCDT
                                     20021025AAD
                                                  LIC
36A NC ROANOKE RAPIDS
                           BMPEDT
                                     20080617AAN
                                                  CP
36A OH COLUMBUS
                                     19991029AGZ
                                                  CP
                           BPCDT
36A SC GREENVILLE
                           DTVPLN
                                     DTVP1346
                                                  PLN
After Analysis
                                        DTVPLN
Results for: 36A VA ROANOKE
                                                  DTVP1352
                                                               PLN
  HAAT 623.0 m, ATV ERP 700.0 kW
                                 POPULATION
                                              AREA (sq km)
  within Noise Limited Contour
                                   1248337
                                                35759.6
  not affected by terrain losses
                                   1076681
                                                29691.1
   lost to NTSC IX
                                                    0.0
  lost to additional IX by ATV
                                     15080
                                                  495.3
  lost to ATV IX only
                                     15080
                                                  495.3
  lost to all IX
                                     15080
                                                  495.3
 Potential Interfering Stations Included in above Scenario
36A DC WASHINGTON
                           BLCDT
                                     19991013AAB LIC
36A MD OAKLAND
                           RMPEDT
                                     20080620ANK
                                                  CP
36A NC FAYETTEVILLE
                           BLCDT
                                     20021025AAD
                                                  LIC
36A NC ROANOKE RAPIDS
                           BMPEDT
                                     20080617AAN
36A OH COLUMBUS
                           BPCDT
                                     19991029AGZ
                                                  CP
36A SC GREENVILLE
                           DTVPLN
                                     DTVP1346
                                                  PLN
35A NC HIGH POINT
                           USERRECORD01
                                                  APP
Percent new IX =
                   0.0180%
Worst case new IX
                    0.0180% Scenario
```

Analysis of Interference to Affected Station 16

```
Call
                      City/State
                                            Application Ref. No.
Channel
  35
           WGHP
                     HIGH POINT NC
                                               USERRECORD~01
     Stations Potentially Affecting This Station
Chan
     Call
                                     Dist(km) Status Application Ref. No.
                 City/State
     WSOC-TV CHARLOTTE NC
                                        100.9 LIC
                                                                -20040526ANW
 34
                                                      BLCDT
 34
      WSOC-TV CHARLOTTE NC
                                        100.9 PLN
                                                      DTVPLN
                                                                -DTVP1260
 35
      WDCA
               WASHINGTON DC
                                        425.9 PLN
                                                      DTVPLN
                                                                -DTVP1283
               WASHINGTON DC
                                        425.9 CP MOD BMPCDT
                                                                -20060519ACK
 35
      WDCA
                                        425.9 APP
124.4 LIC
124.4 PLN
              WASHINGTON DC
      WDCA
                                                      BPCDT
                                                                -20080620ANP
 35
      WFPX-TV FAYETTEVILLE NC
                                                                -20021025AAD
 36
                                                      RICDT
 36
      WFPX
              FAYETTEVILLE NC
                                                      DTVPLN
                                                                -DTVP1336
      WUNP-TV
                                        187.8 CP MOD BMPEDT
              ROANOKE RAPIDS NO
                                                                -20080617AAN
 36
      WUNP-TV ROANOKE RAPIDS NC
                                        187.9 PLN
 36
                                                      DTVPLN
                                                                ~DTVP1337
 36
      WPXR-TV ROANOKE VA
                                        156.0 LIC
                                                      BLCDT
                                                                -20020510AAB
 36
      WPXR
               ROANOKE VA
                                        156.0 PLN
                                                      DTVPLN
                                                                -DTVP1352
 Total scenarios =
Result key:
                785
             785
1 Affected station
Scenario
                                        16
Before Analysis
Results for: 35A NC HIGH POINT
                                        USERRECORD01
                                                               APP
  HAAT 365.0 m, ATV ERP 1000.0 kW
                                 POPULATION
                                              AREA (sq km)
   within Noise Limited Contour
                                   3152166
                                                33723.0
  not affected by terrain losses
                                   3108858
                                                33101.5
   lost to NTSC IX
                                                   0.0
   lost to additional IX by ATV
                                     319108
                                                 2137.4
   lost to ATV IX only
                                    319108
                                                 2137.4
   lost to all IX
                                    319108
                                                 2137.4
 Potential Interfering Stations Included in above Scenario
34A NC CHARLOTTE
                           BLCDT
                                     20040526ANW LIC
36A NC FAYETTEVILLE
                           BI/CDT
                                     20021025AAD LIC
36A VA ROANOKE
                           BLCDT
                                     20020510AAB LIC
Result key:
                786
             2 Affected station
Scenario
Before Analysis
Results for: 35A NC HIGH POINT
                                        USERRECORD01
                                                               APP
  HAAT 355.0 m, ATV ERP 1000.0 kW
                                 POPULATION
                                             AREA (so km)
   within Moise Limited Contour
                                               33723.0
                                   3152166
  not affected by terrain losses
                                    3108858
                                                33101.5
   lost to NTSC TX
                                        ถ
                                                   0.0
                                                 2137.4
   lost to additional IX by ATV
                                    319108
   lost to ATV IX only
                                    319108
                                                 2137.4
   lost to all IX
                                    319108
                                                 2137.4
 Potential Interfering Stations Included in above Scenario
34A NC CHARLOTTE
                                     20040526ANW LIC
36A NC FAYETTEVILLE
                           BLCDT
                                     20021025AAD LIC
36A VA ROANOKE
                           DTVPLN
                                     DTVP1352
                                                  PLN
Result key:
                787
            787
3 Affected station
Scenario
Before Analysis
Results for: 35A NC HIGH POINT
                                        USERRECORD01
                                                               APP
  HAAT 365.0 m, ATV ERP 1000.0 kW
                                 POPULATION AREA (sq km)
```

Analysis of current record

```
within Noise Limited Contour
                                  3152166
                                               33723.0
  not affected by terrain losses
                                 3108858
                                               33101.5
   lost to MTSC IX
                                    0
                                                0.0
   lost to additional IX by ATV
                                                2137.4
                                    319108
  lost to ATV IX only
                                    319108
                                                2137.4
  lost to all IX
                                    319108
                                                2137.4
Potential Interfering Stations Included in above Scenario
34A NC CHARLOTTE
                           BLCDT
                                    20040526ANW LIC
36A NC FAYETTEVILLE
                           DTVPLN
                                    DTVP1336
                                               PLN
36A VA ROANOKE
                           BLCDT
                                    20020510AAB LIC
Result key:
               788
              4 Affected station
Scenario
                                        16
Before Analysis
Results fcr: 35A NC HIGH POINT
                                       USERRECORD01
                                                             APP
  HAAT 365.0 m, ATV ERP 1000.0 kW
                                 POPULATION
                                            AREA (sq km)
  within Noise Limited Contour
                                 3152166
                                             33723.0
  not affected by terrain losses
                                   3108858
                                               33101.5
  lost to NTSC IX
                                    0
                                                  0.0
   lost to additional IX by ATV
                                    319108
                                                2137.4
  lost to ATV IX only
                                    319108
                                                2137.4
                                                2137.4
  lost to all IX
                                    319108
Potential Interfering Stations Included in above Scenario
34A NC CHARLOTTE
                           BLCDT.
                                    20040526ANW LIC
36A NC FAYETTEVILLE
                           DTVPLN
                                    DTVP1336
                                                 PLN
36A VA ROANOKE
                           DTVPLN
                                    DTVP1352
                                                 PLN
Result key:
               789
           789
5 Affected station
Scenario
Before Analysis
Results for: 35A NC HIGH POINT
                                      USERRECORD01
                                                              APP
  HAAT 365.0 m, ATV ERP 1000.0 kW
                                 POPULATION
                                            AREA (sq km)
                                   3152166
  within Noise Limited Contour
                                               33723.0
  not affected by terrain losses
                                   3108858
                                               33101.5
  lost to NTSC IX
                                      0
                                                  0.0
   lost to additional IX by ATV
                                    319108
                                                2137.4
   lost to ATV IX only
                                    319108
                                                2137.4
   lost to all IX
                                    319108
                                                2137.4
Potential Interfering Stations Included in above Scenario
                           DTVPLN
34A NC CHARLOTTE
                                    DTVP1260
                                                 PIN
36A NC FAYETTEVILLE
                                    20021025AAD LIC
                           BLCDT
                           BLCDT
36A VA ROANOKE
                                    20020510AAB LIC
             790
6 Affected station
Result key:
Scenario
                                        16
Before Analysis
Results for: 35A NC HIGH POINT
                                       USERRECORD01
                                                              APP
  HAAT 365.0 m, ATV ERP 1000.0 kW
                                POPULATION
                                             AREA (sq km)
                                              33723.0
  within Noise Limited Contour
                                   3152166
  not affected by terrain losses
                                   3108858
                                               33101.5
   lost to NTSC IX
                                      0
                                                  0.0
   lost to additional IX by ATV
                                    319108
                                                2137.4
   lost to ATV IX only
                                    319108
                                                2137.4
   lost to all IX
                                    319108
                                                2137.4
Potential Interfering Stations Included in above Scenario
34A NC CHARLOTTE
                           DTVPLN
                                    DTVP1260
```

36A NC FAYETTEVILLE 36A VA ROANOKE	BLCDT DTVPLN	20021025AAD DTVP1352	LIC PLN			
Result key: 791 Scenario 7 Affected Before Analysis	station	16				
Results for: 35A NC HIGH PO HAAT 365.0 m, ATV ERP 1	APP					
		OPULATION AR				
within Noise Limited Con	tour	3152166	33723.0			
not affected by terrain	losses	3108858	33101.5			
lost to NTSC IX		0	0.0			
lost to additional IX by	ATV	319108	2137.4			
lost to ATV IX only		319108	2137.4			
lost to NTSC IX lost to additional IX by lost to ATV IX only lost to all IX		319108	2137.4			
Potential Interfering Stat				7		
34A NC CHARLOTTE	DTVPLN	DTVP1260	PIN			
34A NC CHARLOTTE 36A NC FAYETTEVILLE	DTVPLN	DTVP1260 DTVP1336	PLN			
36A VA ROANOKE	BLCDT	20020510AAB				
Result key: 792 Scenario 8 Affected Before Analysis						
Results for: 35A NC HIGH POINT USERRECORD01 HAAT 365.0 m, ATV ERP 1000.0 kW						
•	P	OPULATION AR	EA (sqkm)			
within Noise Limited Con	tour	3152166	33723.0			
not affected by terrain	losses	3108858	33101.5			
lost to additional IX by	ATV	319108	2137.4			
lost to ATV IX only		319108	2137.4			
lost to ATV IX only lost to all IX		319108	2137.4			
Potential Interfering Stat				8		
34A NC CHARLOTTE	DTVPLN	DTVP1260	PLN			
36A NC FAYETTEVILLE						
36A VA ROANOKE		DTVP1352				

FINISHED FINISHED FINISHED FINISHED FINISHED

ATTACHMENT B

Interference Consent Agreement

INTERFERENCE ACCEPTANCE AGREEMENT

This Interference Acceptance Agreement is entered into as of September 30, 2009 by and between COMMUNITY TELEVISION OF NORTH CAROLINA LICENSE, LLC ("WGHP") and WSOC TELEVISION, INC. ("WSOC").

WGHP holds an authorization from the Federal Communications Commission ("FCC") to construct and operate a post-transition DTV facility for television station WGHP(TV), High Point, North Carolina (FCC Facility ID No. 72106), on channel 8 at 18.75 kW effective radiated power ("ERP")(File No. BMPCDT-20080620ANG, hereinafter the "WGHP Maximization Permit"). WGHP is also authorized by the FCC to construct a post-transition DTV facility on channel 8 at 11.5 kW ERP (File No. BPCDT-20080311ACD, hereinafter the "WGHP Permit"). WGHP filed a license to cover the WGHP Permit on July 1, 2009 (File No. BLCDT-20090701ADA) that is pending before the FCC.

WSOC holds an FCC license to operate a post-transition DTV facility for television station WSOC-TV, Charlotte, North Carolina (FCC Facility ID No. 74070), on channel 34 at 1000 kW ERP (File No. BLCDT-20040526ANW, hereinafter the "WSOC License"). WSOC also holds an FCC license to operate a post-transition DTV facility for television station WAXN-TV, Kannapolis, North Carolina (FCC Facility ID No. 12793) ("WAXN-TV"), on channel 50 at 91 kW ERP (File No. BLCDT-20090511AYQ). WSOC believes that certain persons located in portions of the WAXN-TV digital service area are having difficulty receiving the signal of WAXN-TV.

As of June 11, 2009, WGHP held an FCC license to operate a DTV facility for television station WGHP(TV), High Point, North Carolina on channel 35 at 1000 kW ERP (File No. BLCDT-20060912ACW, hereinafter the "WGHP License"). On June 12, 2009, WGHP ended operation on channel 35 and began operation of a post-transition DTV facility for television station WGHP(TV) on channel 8 under the WGHP Permit. On June 13, 2009, WGHP's pre-transition Digital Television Allotment of channel 35 to High Point, North Carolina, was effectively cancelled by operation of the DTV Delay Act, Pub. L. No. 111-4, 123 Stat. 112 (2009).

On or about June 17, 2009, WGHP applied to the FCC for a Special Temporary Authorization ("STA") to once again operate a DTV facility for television station WGHP(TV) on channel 35 at 1000 kW ERP (File No. BDSTA-20090617ADU, hereinafter the "WGHP STA") using the WGHP License facilities. WSOC agreed to accept the incremental interference predicted to be caused by the WGHP STA facilities to the population inside the protected service area associated with the WSOC License (where such affected persons largely are located in and around Randolph County, North Carolina) for a period not to exceed six months.

Consistent with the FCC's rules and for good and fair consideration, the sufficiency of which is hereby acknowledged, WGHP and WSOC hereby agree as follows:

1. All references to predicted service area shall mean the service area predicted by applying the FCC's rules and policies in effect as of the date of this Agreement.

- 2. WGHP intends to file a Petition for Rulemaking ("Petition") with the FCC to amend the post-transition Digital Television Table of Allotments by substituting channel 35 for its allotted channel 8 channel at High Point, North Carolina. In the Petition, WGHP intends to request the technical parameters of the WGHP License facilities (hereinafter the "WGHP Petition Facilities") for its allotment. If and when the FCC grants the Petition and changes WGHP's post-transition digital allotment, WGHP intends to file a corresponding digital construction permit application specifying the WGHP Petition Facilities (the "WGHP Petition Application"). WGHP may, in its sole discretion, file a construction permit application at a later date to move the transmitting antenna higher on the tower with technical parameters specified in Exhibit A of this Agreement (the "WGHP Antenna Application").
- 3. WSOC hereby consents to FCC approval of the Petition, the WGHP Petition Application, and the WGHP Antenna Application (if filed). Interference from the WGHP Petition Facilities and the WGHP Petition Application Facilities is predicted to 2.8 percent of the persons inside the protected service area associated with the WSOC License. Interference from the WGHP Antenna Application Facilities is predicted to 2.95 percent of the persons inside the protected service area associated with the WSOC License. WSOC also hereby consents to a six month extension of the WGHP STA, if necessary. Under no circumstance shall WGHP rely on this consent to seek or obtain FCC approval for a modification of WGHP(TV)'s post-transition digital facilities that increases the amount of predicted interference to the persons inside the protected service area associated with the WSOC License beyond that predicted in the WGHP Antenna Application.
- 4. WSOC intends to file a construction permit application for a so-called "Replacement Digital Television Translator" (authorized in MB Docket No. 08-253) to be associated with WAXN-TV with technical parameters specified in Exhibit B of this Agreement (the "WAXN Replacement Translator Application"). Interference from the WAXN Replacement Translator Application Facilities is predicted to 1.4 percent of the persons inside the protected service area associated with the WGHP Petition Application (where such affected persons largely are located in and around Rowan and Iredell Counties in North Carolina), should the WGHP Petition Application be approved by the FCC.
- 5. WGHP hereby consents to FCC approval of the WAXN Replacement Translator Application. Under no circumstance shall WSOC rely on this consent to seek or obtain FCC approval for a modification of the facilities specified in the WAXN Replacement Translator Application that increases the amount of predicted interference to the service area associated with the WGHP Petition Application beyond that predicted in the WAXN Replacement Translator Application.
- 6. WSOC and WGHP may file the above-referenced petitions and/or applications at any time in the future.
- Each of WSOC and WGHP shall take all commercially reasonable steps to satisfy any questions or concerns raised by the FCC with respect to any regulatory filings implicated

by the Agreement, notify the other of any such FCC inquiries, and furnish all information requested by the FCC with respect thereto. Neither WSOC nor WGHP shall take any action that is inconsistent with its obligations under this Agreement or that could hinder or delay the other party's enjoyment of its rights and interests contemplated by this Agreement.

e. This Agreement may be executed in one or more counterparts, each of which will be doemed an original. No amendment or waiver of compliance with any provision hereof shall be effective unless in a writing signed by the party against whom enforcement is sought. Acceptance of the interference agreed to herein shall continue to run with the station, not the licensee, and shall be binding on future successors or assigns (without the need for consent) in the event of assignment of a station's license or a change in control of a licensee. This Agreement shall be governed by the laws of the State of North Carolina without giving effect to the choice of law provisions thereof. This Agreement constitutes the entire agreement and understanding of the parties hereto and supersedes all prior agreements and understandings with respect to the subject matter hereof. Except for the consent set forth above, no consideration is being paid by either party in connection with this Agreement.

COMMUNITY TELEVISION OF NORTH CAROLINA LICENSE, LLC

Samela C Jaylo

By:

Pemela Taylor CFO

WSOC TELEVISION, INC.

Andrew A. Merdek

Secretary

EXHIBIT A

WGHP Antenna Application Technical Parameters

Channel: 35

Geographic Coordinates: 35-48-46 N, 79-50-29 W

Antenna Structure Registration: 1251069

Overall Tower Height: 380 m AGL

Ground Elevation: 239 m AMSL

Height of Radiation Center: 371 m AGL

398 m HAAT

Antenna Type: Non-Directional

Maximum Effective Radiated Power: 1000 kW

EXHIBIT B

WAXN Replacement Translator Application Technical Parameters

Channel: 36

Geographic Coordinates: 35-35-32 N, 80-37-44 W

Antenna Structure Registration: 1023508 Overall Tower Height: 315 m

Ground Elevation: 248 m

Radiation Center: 400 m AMSL

152 m AGL

Antenna Type: ERI, ALP16L3-HSW

Cardioid

Antenna Major Lobe Orientation: 30 degrees true

Transmitter Power Output: 0.95 kW

Emission Mask: Stringent

Maximum Effective Radiated Power: 11.5 kW